

REMARKS

Reconsideration and allowance of the subject application in view of the following remarks is respectfully requested.

The Applicant takes issue with the rejections advanced in this office action.

First point:

The examiner asserts that: "*Regarding claim 1 and 2, the applicant first argues that Wu does not disclose that failed links become inactive and protection line becomes active. However, as shown in the previous rejection, the identifier of the working line is reassigned to the protection line when the working line fails. Therefore, the working line becomes inactive in view of the system since all data is routed by the identifier and thus to the protection line. That is, the lines are switched between active and inactive state by the reassignment of identifier and updating the cross connect table, as explained in the previous action.*"

Nothing in Wu suggest that "working lines become inactive in the view of the system" when data are routed through protection line. Particularly, the fact that "When a line failure occurs in the physical line, the physical signals are rerouted onto the protection line" does not involve that working line becomes inactive and protection line becomes active as claimed in claim 1. So Wu does not disclose that "a serial line being an active line, the other serial line of said group being an inactive line" as claimed in claim 1.

Second point:

The examiner argues that: "*The applicant also argues that Wu does not disclose that a physical identifier being allocated to each serial line. However, as shown in the previous action, paragraph 100131 and Fig. 2 of Wu does disclose a number of working lines with physical identifiers.*"

Actually, Wu discloses a number of working lines with physical identifiers. But it does not mean that one working line has a unique physical identifier in the system. For example, according to Wu it's possible to have two working lines with both the same physical identifier. As a consequence, Wu does not disclose that a physical identifier is allocated to each serial line as claimed in claim 1.

Third point:

The examiner advances that: "*The applicant further argues that Wu does not disclose allocating logical identifier for each group of serial lines, which the previous action showed that it does by assigning the same logical identifier to the working line and the corresponding protection line.*"

As claimed in claim 1, each group of serial lines has a logical identifier prior to any other operations. Especially the step of associating the physical identifier of the active serial line with each logical identifier occurs after the step of allocating each group of serial lines with a logical identifier (described as a second step in claim 1). On the opposite, in Wu, the association of the same logical identifier to the working line and the corresponding protection line is consecutive to a remapping operation as described in [0013]. So Wu, does not disclose the different steps of the process in the order as described in claim 1.

For all the arguments above mentioned, the claim 1 contains characteristics not disclosed in Wu, and in any of the other documents mentioned in the office action. Therefore, the rejections of:

- 1) Claims 1 and 2 under 35 U.S.C. 103(a) as being unpatentable over Wu (US 2005/0036493) in view of Khalil (US 2003/0002468);
- 2) Claim 3 under 35 U.S.C. 103(a) as being unpatentable over Wu (US 2005/0036493) in view of Khalil (US 2003/0002468) and Bortoloso (US2003/0120782);
- 3) Claim 4 under 35 U.S.C. 103(a) as being unpatentable over Wu (US 2005/0036493) in view of Khalil (US 2003/0002468) and Bortoloso (US2003/0120782) as applied to claim 3 above, and further in view of Ahmed (US 6,647,432);
- 4) Claim 5 under 35 U.S.C. 103(a) as being unpatentable over Wu (US 2005/0036493) in view of Khalil (US 2003/0002468) and Bortoloso (US2003/0120782) as applied to claim 3 above, and further in view of Stein (US 5,497,463); and
- 5) Claim 6 under 35 U.S.C. 103(a) as being unpatentable over Wu (US 2005/0036493) in view of Khalil (US 2003/0002468), Bortoloso (US2003/0120782) and Ahmed (US 6,647,432) as applied to claim 4 above, and further in view of Stein (US 5,497,463);

are summarily traversed.

Conclusion

All issues having been addressed, it is respectfully submitted that the application is in condition for allowance and a Notice to that effect is earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
LOWE HAUPTMAN HAM & BERNER, LLP



Kenneth M. Berner
Registration No. 37,093

1700 Diagonal Road, Suite 300
Alexandria, Virginia 22314
(703) 684-1111
(703) 518-5499 Facsimile
Date: October 28, 2008
KMB/KT/ser